

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

SHARON GORE, as Administratrix)
and Personal Representative of the)
Estate of TULLIS HERBERT GORE,)
Deceased,)
)
Plaintiff,)
)
v.) CASE NO: 3:06-CV-167-WKW
)
RONALD LARRY FOSTER, JOE)
DUBOSE TRUCKING, et al.,)
)
Defendants.)

NOTICE OF TAKING VIDEO DEPOSITION

TO: Randall J. Haynes, Esq.

Please take notice that on the date and at the time and place indicated below, the defendants, **RONALD LARRY FOSTER and JOE DUBOSE TRUCKING**, will take the video deposition upon oral examination of the person named. The video deposition will be taken for purposes of discovery or for use as evidence in this action pursuant to the Federal Rules of Civil Procedure. The video deposition will be taken before a court reporter and/or some other officer authorized by law to administer oaths. The video deposition will continue from hour to hour and day to day until completed. You are invited to attend the video deposition and examine the witness as you see fit.

DEPONENT: **KEN BUCKLEY**

DATE: **Wednesday, September 20, 2006**

TIME: **5:00 p.m.**

PLACE:

**Hilton Garden Inn
2555 Hilton Garden Drive
(Airport Road Exit off of I-85)
Auburn, AL 36830**

/s/ David A. Lee

David A. Lee (LEE019)
ASB-3165-E47D
Attorney for Defendant

OF COUNSEL:

PARSONS, LEE & JULIANO, P.C.
300 Protective Center
2801 Highway 280 South
P. O. Box 530630 (35253-0630)
Birmingham, AL 35223-2480
(205) 326-6600

CERTIFICATE OF SERVICE

I hereby certify that I have on this 18th day of September, 2006, served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing same in the U.S. Mail properly addressed and first class postage prepaid to:

Randy Haynes, Esq.
MORRIS, HAYNES & HORNSBY
Post Office Box 1660
Alexander City, AL 35011-1660

Richard E. Broughton, Esq.
BALL, BALL, MATHEWS & NOVAK
P. O. Box 2148
Montgomery, AL 36102-2148

\s\ David A. Lee

OF COUNSEL

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NOTICE OF SERVICE OF DISCOVERY DOCUMENTS

Come now the defendants, **RONALD LARRY FOSTER and JOE DUBOSE TRUCKING**, by and through their attorney, David A. Lee, and gives notice of filing the following discovery documents in the above-styled cause and serving a copy of same upon all attorneys of record.

- First Interrogatories to Plaintiff.
- Request for Production of Documents.
- Request for Admissions.
- Notice of Taking Video Deposition of Mr. Ken Buckley on September 20, 2006.
- Response to Request for Production.
- Answers to Interrogatories.
- Response to Request for Admissions.
- Other:

/s/ David A. Lee

David A. Lee (LEE019)
ASB-3165-E47D
Attorney for Defendants

OF COUNSEL:

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OF COUNSEL